



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
215 Fremont Street  
San Francisco, Ca. 94105

6 SEP 1988

MEMORANDUM

SUBJECT: Ordot Landfill--Proposed Remedial Action Plan

FROM: Harry Seraydarian  
Director  
Water Management Division *[Signature]*

TO: Jeffrey Zelikson  
Director  
Toxics and Waste Management Division

The Water Management has reviewed the proposed remedial action plan for the Ordot Landfill in Guam. During this review the following concerns were raised.

The proposed remedial action plan states that this site is isolated from the designated sole source aquifer. The Federal Register Notice for the Guam Sole Source Aquifer Designation (43 FR 17868) states that both the recharge zone and streamflow source zone (i.e., portions of the Pago and Fonte River basins south of the Adelop-Pago fault) are included in the designated aquifer. According to the map of this aquifer (see attached), the Ordot Landfill appears to be located in the streamflow source zone and therefore, is within the boundary of the designated sole source aquifer.

The RAP states that hazardous wastes have been disposed at this landfill and hazardous constituents have been detected in the ground water downgradient from the landfill. Since there has only been limited monitoring (e.g. a total of 13 samples of leachate, ground water and surface water) on one occasion, we feel it is difficult to determine with confidence whether or not the site poses a threat to the sole source aquifer.

While it is understood that it may not be appropriate for the EPA Superfund Program do additional work at this site, further work is necessary to determine whether this site poses a threat to this sole source aquifer. The Water Management Division strongly supports the recommendation that additional monitoring

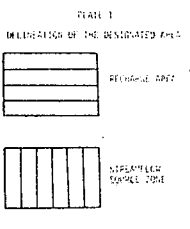
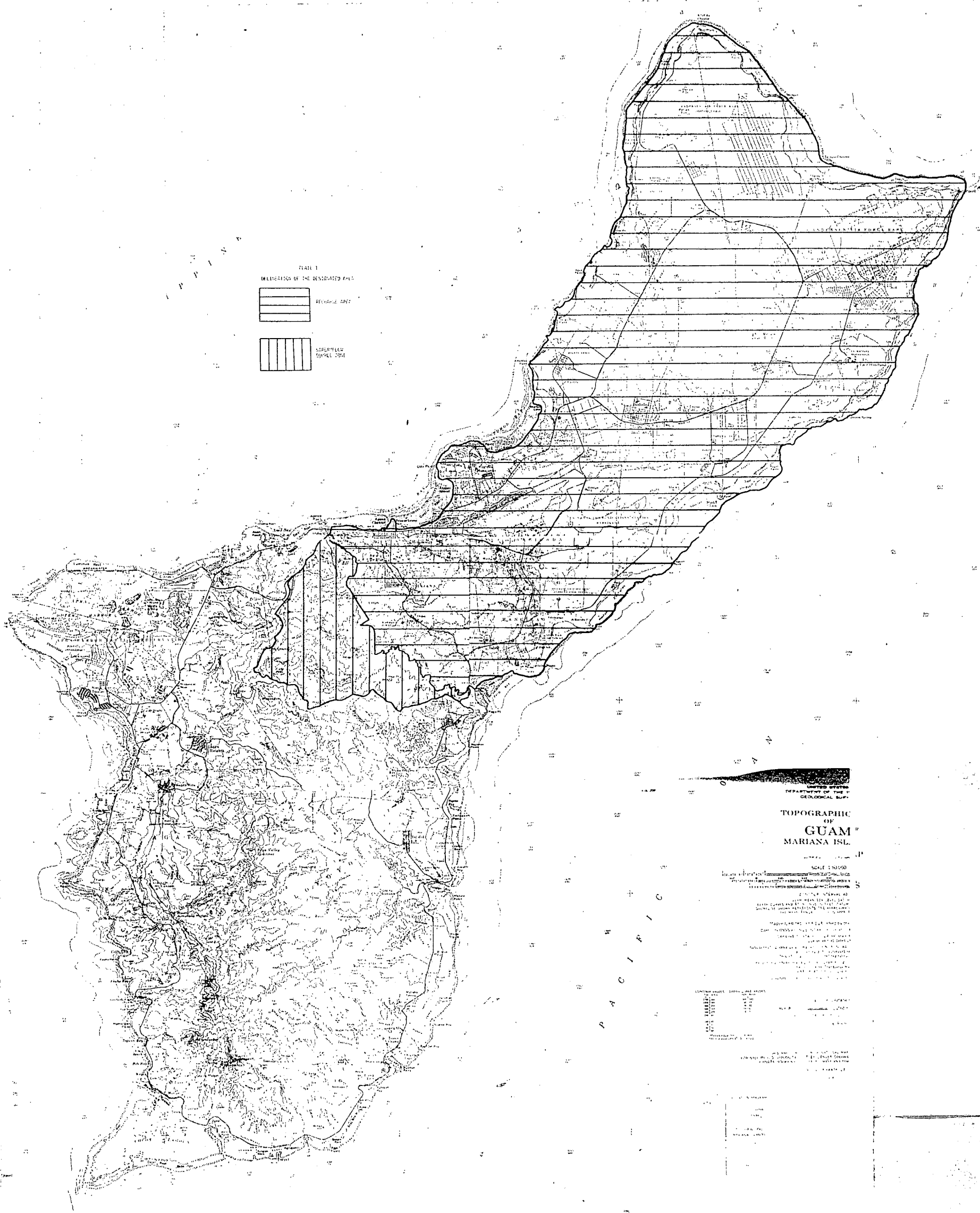
and data collection is necessary to verify that the landfill is hydrologically isolated from the drinking water aquifer. We also strongly encourage your staff to review the information used to support the Sole Source Aquifer Designation as part of this verification. This information is available through the Office of Ground Water.

The Water Management Division has also reviewed this proposed remedial action plan in regards to the requirements under the NPDES program. These comments have been conveyed to the Superfund Program separately. For additional information, please contact Ken Greenburg at X9748.

Thank you for the opportunity to provide input to this project. If you wish to discuss these issues further, please contact Joanne LaBaw at X0841.

Attachment

US01305



UNITED STATES  
DEPARTMENT OF THE ARMY  
GEOLOGICAL SURVEY

**TOPOGRAPHIC  
OF  
GUAM  
MARIANA ISL.**

SCALE 1:50,000

Horizontal scale: 1 inch = 1 mile  
Vertical scale: 1 inch = 1,000 feet

Map projection: Universal Transverse Mercator  
Datum: 1929  
Zone: 52N

Contour interval: 20 feet  
Spot heights: 10 feet and above

Map scale: 1 inch = 1 mile  
Graphic scale: 0 to 1 mile

Map scale: 1 inch = 1,000 feet  
Graphic scale: 0 to 1,000 feet

Map scale: 1 inch = 1,000 feet  
Graphic scale: 0 to 1,000 feet

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